

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20544

In the Matter of  
  
SMS/800, Inc.

WC Docket No. 12-260

**COMMENTS OF DATABASE SERVICE MANAGEMENT, INC. ON SMS/800, INC.'S  
PETITION TO CHANGE THE COMPOSITION OF SMS/800, INC.**

October 1, 2012

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The Commission issued a Public Notice on September 17, 2012 in the above-captioned matter inviting comments from interested parties. (DA 12-1502.) Pursuant to sections 1.415 and 1.419 of the Commission's rules, Database Service Management, Inc. ("DSMI") respectfully submits the following brief comments concerning SMS/800, Inc.'s Petition to Change the Composition of SMS/800, Inc. ("Petition").

In its Petition, SMS/800, Inc. seeks, *inter alia*, to assume the role that DSMI has held for many years as the neutral toll-free number administrator ("TFNA"). DSMI's involvement in administering toll-free numbers dates back to 1993, and, as required by statute, DSMI has served as the TFNA of the SMS/800 service since 2000. 47 U.S.C. § 251(e)(1); 5<sup>th</sup> Toll-free Service R&O ¶ 35. DSMI has extensive institutional knowledge concerning the role of the TFNA. To assist the Commission as it considers transitioning the TFNA position, DSMI would simply like to summarize the major roles and responsibilities the TFNA performs. These are:

- Monitoring of toll-free number utilization data

The TFNA monitors toll-free number utilization data to determine if enough toll-free numbers are available to meet market needs. This involves regularly tracking the quantity of toll-

free numbers in use, the quantity in each number status, the quantity of toll-free numbers available for reservation and assignment, trends in number utilizations, or the like.

- Monitoring of SMS/800 resource utilization data

The TFNA also ensures that the mainframe that serves as the heart of the toll-free numbering system, as well as the associated servers and other hardware and software components, is sufficiently maintained and upgraded as needed to protect users against slowness or ineffectiveness of the system. This involves monitoring mainframe CPU utilization levels, mainframe transaction counts, CPU and memory utilization levels for all servers, and other similar data.

- Monitoring SMS/800 functionality to assure assignment of toll-free numbers on a neutral basis as well as on a “first come, first served” basis to all Resp Orgs

The TFNA also helps ensure the neutral distribution of toll-free numbers. This involves reviewing planned software enhancements, as well as maintenance requests and trouble requests, reviewing existing test cases, and pertinent vendor contracts and proposed amendments to the SMS/800 Tariff to ascertain whether any issues exist that may compromise neutrality. The goal is to provide orderly queuing and fairness in the assignment of numbers in compliance with FCC mandates.

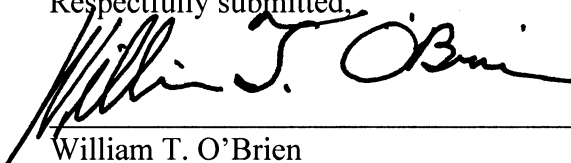
- Reporting to the FCC and other regulatory bodies or pertinent industry organizations

The TFNA also often acts as an interface with the appropriate regulatory bodies or industry organizations regarding issues that arise. This includes helping respond to agency subpoenas, inquiries of Resp Orgs, or other interested parties and communicating with the Commission where appropriate. The TFNA should be ready to provide the Commission with necessary planning and monitoring updates so as to assure accurate and timely FCC review and guidance on impending matters.

## CONCLUSION

DSMI shares this information gained from its experience as the neutral administrator in hopes that the Commission will find it useful in any transition of this role.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William T. O'Brien", is written over a horizontal line.

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